

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD KATZ	:	
Plaintiff	:	CIVIL ACTION
v.	:	NO. 3:15-cv-1187
NATIONAL BOARD OF MEDICAL	:	(MARIANI, J.)
EXAMINERS, et al.,	:	(SAPORITO, M.J.)
Defendants	:	

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S "MOTION
TO COMPEL FURTHER RESPONSES TO ADMISSION ANSWERS"**

Defendants, the National Board of Medical Examiners (NBME) and the Federation of State Medical Boards (FSMB), oppose plaintiff's "Motion to Compel Further Responses to Admission Answers." In the course of discovery, defendants have answered plaintiff's interrogatories, his request for documents (and supplied 280 pages of documents), his first set of supplemental interrogatories, his second set of supplemental interrogatories and his requests for admission.

On March 28, 2016, defendants opposed plaintiff's "Motion to Compel Responsive Answers to Supplemental Interrogatories Number One," and submitted a detailed memorandum of law. Defendants incorporate that memorandum of law here.

Plaintiff's motion regarding defendants' answers to his requests for admission is simply wrong. Defendants provided thoughtful and specific responses to each request for admission, in accordance with Fed. R. Civ. P. 36, but plaintiff is dissatisfied with those responses.

Defendants have complied fully with the letter and the spirit of the discovery rules, including in responding to plaintiff's requests for admission, and respectfully request that the Court review the requests for admission in their entirety, along with defendants' answers, and deny plaintiff's motion.

RESPECTFULLY SUBMITTED,

/s/ Michael E. Sacks

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States

CERTIFICATE OF SERVICE

I certify that the foregoing Opposition of Defendants, the National Board of Medical Examiners and the Federation of State Medical Boards, to Plaintiff's "Motion to Compel Further Responses to Admission Answers" is being filed electronically with the Clerk of the Court on April 25, 2016, using the electronic case filing system, which will automatically send email notifications of such filing to registered parties. This motion is also being served by electronic mail and regular mail upon:

Richard Katz
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Pro se

/s/ Michael E. Sacks
Michael E. Sacks